

EXHIBIT F

Samuel Chuang, Esq.

Attorney-at-Law

135-11 40th Road, Suite 4C, Flushing, N.Y. 11354
Tel: 718.353.4700 Fax: 212.202.4527 Email: Samuel.Chuang@chuanglaw.com

May 27, 2011

Ms. Amy Tai, Esq.
Urban Justice Center
123 William Street, 16th Floor
New York, NY 10038

Re: Gao, et al., v. 85 Perfect Team Corporation, et al., Civil Action No. 10-CV-01637
(ENV) (CLP) USDC EDNY

Dear Ms. Tai:

In response to your letter dated February 23, 2011:

Attached is a translated copy of the Answers to Plaintiff's Interrogatories dated June 25, 2010.

Also attached are affidavits from my clients further responding to your letter.

Regarding your issue with the identification of persons, Local Rule 26.3(c)(3) contains the qualification "to the extent known." Defendants have informed me that they have already provided all known identification. If there is something more in particular that you want them to deny knowledge or information of, please prepare a list for me to review.

Regarding your issue with the documents marked "Attorneys' Eyes Only," you seem to have no qualms or hesitation about posting documents containing confidential and protected documents on PACERS. There is no deadline set for submitting a protective order, and more to the point, why do you need or want to share, beyond only the attorneys, documents regarding non-parties' private information?

Sincerely,

/s/ SAMUEL CHUANG

SAMUEL CHUANG

*Attorney for Defendants Perfect Team
Corporation, d/b/a Guang Zhou Restaurant,
Chun Kit Cheng, a/k/a Jun Jie Zheng, and Jia
Li Wang*

Ms. Amy Tai, Esq.
Urban Justice Center

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cc:

Amy Tai, Esq.
Urban Justice Center
123 William Street 16th Floor
New York, NY 10038
646-459-3026
Fax: 212-533-4598
Email: atai@urbanjustice.org
Attorneys for Plaintiffs

Edward Tuddenham
Law Office Edward Tuddenham
1339 Kalmia Rd Nw
Washington, DC 20012
202-249-9499
Fax: 512-532-7780
Email: etudden@io.com
Attorneys for Plaintiffs

David Andrew Colodny, Esq.
Urban Justice Center
123 William Street
16th Floor
New York, NY 10038
646-602-5600
Fax: 212-533-4598
Email: dcolodny@urbanjustice.org
Attorneys for Plaintiffs

Benjamin B. Xue
Law Offices of Benjamin B. Xue
401 Broadway
Ste 1009
New York, NY 10013
(212)219-2275
Fax: (212)219-2276
Email: benjaminbxue@aol.com
*Attorney for Defendants Ji Shiang, Inc., d/b/a
Guang Zhou Restaurant & Feng Lin*

Zhuo Ping Chen
136-59 37th Avenue, 2F
Flushing, NY 11354
917-886-7629
PRO SE

INTERROGATORY NO. 1:

Identify all current and former owners, shareholders, officers, and directors of the Corporate Defendants, including the nature and amount of their ownership interest, their title(s) if an officer or director, and the period of times in which they held such positions or had such ownership interest.

ANSWER TO INTERROGATORY 1:

As to Perfect Team Corporation:

| | | | | | |
|----------------|-------------|-----------|--------|-----------|--------|
| Chun Kit Cheng | Chairman | 6/07-1/08 | 71.5%; | 1/08-6/09 | 100.0% |
| Liai Ang | Manager | 6/07-1/08 | 10.0%; | 1/08-6/09 | 0.0% |
| Wu Rei Wu | Captain | 6/07-1/08 | 6.0%; | 1/08-6/09 | 0.0% |
| Wu Yong Qan | Captain | 6/07-1/08 | 5.0%; | 1/08-6/09 | 0.0% |
| Lang Zhong | Chef | 6/07-1/08 | 5.0%; | 1/08-6/09 | 0.0% |
| Zheng Yang Yue | Shareholder | 6/07-1/08 | 2.5%; | 1/08-6/09 | 0.0% |

INTERROGATORY NO. 2:

Identify all persons who have participated in the operation or management of the Corporate Defendants, including the time period of such participation, and their responsibilities.

ANSWER TO INTERROGATORY 2:

The names of such persons in Perfect Team Corporation are as follows:

| | |
|----------|------|
| Liai Ang | 2007 |
| KAVIE | 2008 |

INTERROGATORY NO. 3:

Identify and describe all assets You or Defendant Perfect Team Corporation or any of its owners, shareholders, directors, officers, managers, or attorneys transferred to Defendant Ji Shiang, Inc. or any of its owners, shareholders, directors, officers, managers, or attorneys (whether for value or by way of gift; whether real or personal property), including, but not limited to a description of the assets; the consideration paid, if any; and the identities of the transferor(s) and transferee(s).

ANSWER TO INTERROGATORY 3:

No assets were transferred to Ji Shiang, Inc. or any of its owners, shareholders, directors, officers, managers, or attorneys (whether for value or by way of gift; whether real or personal property).

INTERROGATORY NO. 4:

Identify the name and contact information of all attorneys, accountants, or other persons consulted in connection with the purchase, sale, transfer, or lease of the Restaurant or its assets.

ANSWER TO INTERROGATORY 4:

Allen Wu, Esq., 747 3rd Ave. New York, NY 10017.

INTERROGATORY NO 5:

Identify all individuals who have had the power to act directly or indirectly on behalf of You and state the areas in which each has the power to act on behalf of You, including, but not limited to hiring and firing workers, setting and/or changing wages, distributing wages, setting and/or changing work schedules, directing and assigning types of work, or maintaining employment records.

ANSWER TO INTERROGATORY 5:

The names of such individuals in Perfect Team Corporation are as follows:

Liai Ang
Jia Li Wang

INTERROGATORY NO. 6:

Identify all current and former employees of Corporate Defendants and indicate their dates of employment, positions, duties, hours worked, and their rate, frequency, and form of pay (e.g., cash, check, direct deposit, etc.), and their overtime rate if any.

ANSWER TO INTERROGATORY 6:

As to Perfect Team Corporation, all persons are:

| | |
|-----------------|------------------|
| Lou Fu Rong | Chef |
| Li Si Ying | Chef |
| Zen Xie Jie | Chef |
| Lang Zhi Zhong | Chef |
| Wu Wei Pie | Chef |
| Cheng Ang Long | Chef |
| Wang Wie | Chef's Assistant |
| Zhong Wei Xiong | Chef |
| Cheng Kun Jie | Chef |
| Fen Wei Shang | Chef |
| Lei Jian | Chef |
| Liang Zhi Gan | Headwaiter |
| Cheng Chun Ping | Headwaiter |

Perfect Team 3 of 6.

| | |
|-------------------|----------------|
| Zheng Xia Hong | Headwaiter |
| Wu Wei Shun | Headwaiter |
| Lin Feng | Headwaiter |
| Zhang Shuan Shuan | Waiter |
| Pan Hong Hui | Waiter |
| Zhan Di Hui | Waiter |
| Zhong Shi Yie | Waiter |
| Tang Wei Shen? | Waiter |
| Wu Wei Jian | Waiter |
| Gao Li Rong | Waiter |
| Lin Pin Mei | Waiter Helper |
| KAVIE | Manager |
| Liai Ang | Manager |
| Wu Wei Ru | Headwaiter |
| Wu Yong Gan | Headwaiter |
| Zhong Shun Ping | Dim Sum Server |
| Lin Li Ran | Dim Sum Server |
| Chai Han Ying | Dim Sum Server |
| Zhong Lan Jian | Dim Sum Server |
| Ying Jie Xiao | Waiter |
| Zheng Ming | Waiter |
| Wu Shao Rong | Waiter Helper |

See also documents annexed hereto bearing Bates Number PTC000001-PTC000062.

INTERROGATORY NO. 7:

Identify all persons with knowledge or information concerning, or who were responsible for establishing, Corporate Defendants' compensation policies, rates or procedures, including tip practices.

ANSWER TO INTERROGATORY 7:

Liai Ang and Jia Li Wang set compensation policies, rates or procedures. The tip practices were established by the head waiters.

INTERROGATORY NO. 8:

Identify all persons responsible for payment of compensation to employees, including the distribution of tips among employees.

ANSWER TO INTERROGATORY 8:

Liai Ang, Jia Li Wang, and the head waiters.

INTERROGATORY NO. 9:

Identify any persons who have at any time participated in the tip pool at the Restaurant.

ANSWER TO INTERROGATORY 9:

See tip notebook/ledger bearing Bates Number GAO000001-81.

INTERROGATORY NO. 10:

Identify all persons responsible for establishing and maintaining Corporate Defendants' timekeeping, payroll, bookkeeping, or accounting practices.

ANSWER TO INTERROGATORY 10:

Liai Ang and Jia Li Wang.

INTERROGATORY NO. 11:

Identify all persons with knowledge of the records maintained by Defendants concerning the wages paid and hours worked by employees of the Corporate Defendants.

ANSWER TO INTERROGATORY 11:

Liai Ang and Jia Li Wang.

INTERROGATORY. NO. 12:

Describe in detail all efforts made by You or anyone else on behalf of the Corporate Defendants to determine and comply with the requirements of the FLSA and NYLI., concerning minimum wage, overtime pay, retention of gratuities, and spread of hours pay, including, but not limited to, efforts to obtain legal advice regarding the requirements of federal and state laws, and communications with any federal, state, or municipal department or agency concerning minimum wage and overtime laws and regulations. This request is not limited in time.

ANSWER TO INTERROGATORY 12:

Defendants object to this Interrogatory as overly broad, burdensome, and an improper use of interrogatories.

INTERROGATORY NO. 13:

Identify all persons who terminated or participated in the termination of each Plaintiff's employment at Perfect Team Corp., or who have knowledge of the reasons why Perfect Team Corp. terminated the Plaintiffs' employment.

ANSWER TO INTERROGATORY 13:

Although Defendants object to the Interrogatory as overly broad, such person would be Jia Li Wang.

INTERROGATORY NO. 14:

Describe any communications by Defendants to any of the Plaintiffs regarding the refusal to re-hire Plaintiffs or the termination of the Plaintiffs' employment.

ANSWER TO INTERROGATORY 14:

Although Defendants object to the Interrogatory as overly broad as well as to the characterization of the Interrogatory using "refusal to re-hire," there are no communications.

INTERROGATORY NO. 15:

Describe any evaluations, warnings, reprimands, or discipline given to any of the Plaintiffs.

ANSWER TO INTERROGATORY 15:

Xiao Hong Zheng was found to be an over-relaxed worker. She had been seriously insubordinate and caused wastage of the business's resources. She also stirred up disaffection among colleagues. She had been given chances to cure her problems but she still failed to cooperate with her supervisors.

Li Rong Gao was temperamental, provocative to customers and damaged the Restaurant's reputation

INTERROGATORY NO. 16:

Please state all facts and the application of facts to law supporting each of the affirmative defenses asserted by the Defendant.

ANSWER TO INTERROGATORY 16:

Defendants object to this Interrogatory as overly broad, burdensome, and an improper use of interrogatories.

INTERROGATORY NO. 17:

Perfect Team 6 of 6.

If you deny Admission No. 1 or No. 2, state the facts upon which you rely in denying that admission and state who you contend was the employer of the workers at the Restaurant in 2007, 2008, 2009 and 2010 for purposes of the FLSA and New York Labor Law

ANSWER TO INTERROGATORY 17:

Defendants object to this Interrogatory as overly broad, burdensome, and an improper use of interrogatories.

INTERROGATORY NO. 18:

If you deny Admission No. 3 or No. 4, state the facts upon which you rely in denying that admission and state who you contend was the employer of Perfect Team Corp.'s employees in 2007, 2008, and 2009 for purposes of the FLSA and New York Labor Law.

ANSWER TO INTERROGATORY 18:

Defendants object to this Interrogatory as overly broad, burdensome, and an improper use of interrogatories.

Interrogatory 1:

Describe all ownership interest You have or had in Corporate Defendants and all job positions and duties You performed for Corporate Defendants.

Answer to Interrogatory 1:

I owned 71.5% of Perfect Team Corporation and I was Chairman of the Board of Directors.

Interrogatory 2:

Identify all current and former owners, shareholders, officers, and directors of the Corporate Defendants, including the nature and amount of their ownership interest, their title(s) if an officer or director, and the period of times in which they held such positions or had such ownership interest.

Answer to Interrogatory 2:

The names and positions of such persons in Perfect Team Corporation are as follows:

| | | | | | |
|----------------|-------------|-----------|--------|-----------|--------|
| Chun Kit Cheng | Chairman | 6/07-1/08 | 71.5%; | 1/08-6/09 | 100.0% |
| Liai Ang | Manager | 6/07-1/08 | 10.0%; | 1/08-6/09 | 0.0% |
| Wu Rei Wu | Captain | 6/07-1/08 | 6.0%; | 1/08-6/09 | 0.0% |
| Wu Yong Qan | Captain | 6/07-1/08 | 5.0%; | 1/08-6/09 | 0.0% |
| Lang Zhong | Chef | 6/07-1/08 | 5.0%; | 1/08-6/09 | 0.0% |
| Zheng Yang Yue | Shareholder | 6/07-1/08 | 2.5%; | 1/08-6/09 | 0.0% |

Interrogatory 3

Identify all persons who have participated in the operation or management of the Corporate Defendants, including the time period of such participation, and their responsibilities.

Answer to Interrogatory 3:

The names of such persons in Perfect Team Corporation are as follows:

| | |
|----------|------|
| Liai Ang | 2007 |
| KAVIE | 2008 |

Interrogatory 4

Identify and describe all assets You or Defendant Perfect Team Corporation or any of its owners, shareholders, directors, officers, managers, or attorneys transferred to Defendant Ji Shiang, Inc., or any of its owners, shareholders, directors, officers, managers, or attorneys (whether for value of by way of gift; whether real or personal property), including, but not limited to a description of the asset; the consideration aid, if any; and the identities of the transferor(s) and transferee(s).

Answer to Interrogatory 4:

Defendants object to this Interrogatory as overly broad, burdensome, and an improper use of interrogatories.

Interrogatory 6:

Identify all individuals who have had the power to act directly or indirectly on behalf of You and state the areas in which each has the power to act on behalf of You, including but not limited to hiring and firing workers, setting and/or changing wages, distributing wages, setting and/or changing work schedules, directing and assigning types of work, or maintaining employment records.

Answer to Interrogatory 6:

The names of such individuals in Perfect Team Corporation are as follows:

Liai Ang
Jia Li Wang

Interrogatory 7

Identify all current and former employees of Corporate Defendants, and indicate their dates of employment, positions, duties, hours worked, and their rate, frequency, and form of pay (e.g., cash, check, direct deposit, etc.), and their overtime rate if any.

Answer to Interrogatory 7

As to Perfect Team Corporation, all persons are:

Chun Kit Cheng 3 of 4.

| | |
|-------------------|------------------|
| Lou Fu Rong | Chef |
| Li Si Ying | Chef |
| Zen Xie Jie | Chef |
| Lang Zhi Zhong | Chef |
| Wu Wei Pie | Chef |
| Cheng Ang Long | Chef |
| Wang Wie | Chef's Assistant |
| Zhong Wei Xiong | Chef |
| Cheng Kun Jie | Chef |
| Fen Wei Shang | Chef |
| Lei Jian | Chef |
| Liang Zhi Gan | Headwaiter |
| Cheng Chun Ping | Headwaiter |
| Zheng Xia Hong | Headwaiter |
| Wu Wei Shun | Headwaiter |
| Lin Feng | Headwaiter |
| Zhang Shuan Shuan | Waiter |
| Pan Hong Hui | Waiter |
| Zhan Di Hui | Waiter |
| Zhong Shi Yie | Waiter |
| Tang Wei Shen? | Waiter |
| Wu Wei Jian | Waiter |
| Gao Li Rong | Waiter |
| Lin Pin Mei | Waiter Helper |
| KAVIE | Manager |
| Liai Ang | Manager |
| Wu Wei Ru | Headwaiter |
| Wu Yong Gan | Headwaiter |
| Zhong Shun Ping | Dim Sum Server |
| Lin Li Ran | Dim Sum Server |
| Chai Han Ying | Dim Sum Server |
| Zhong Lan Jian | Dim Sum Server |
| Ying Jie Xiao | Waiter |
| Zheng Ming | Waiter |
| Wu Shao Rong | Waiter Helper |

Interrogatory 10:

Identify any persons who have at any time participated in the tip pool at the Restaurant.

Answer to Interrogatory 10:

See tip notebook/ledger annexed hereto bearing Bates Number GAO000001-81.

Interrogatory 13:

Describe in detail all efforts made by You or anyone else on behalf of the Corporate Defendants to determine and comply with the requirements of the FLSA and NYLL concerning minimum wage, overtime pay, retention of gratuities, and spread of hours pay, including, but not limited to, efforts to obtain legal advice regarding the requirements of federal and state laws, and communications with any federal, state, or municipal department or agency concerning minimum wage and overtime laws and regulations. This request is not limited in time.

Answer to Interrogatory 13:

Defendants object to this Interrogatory as overly broad, burdensome, and an improper use of interrogatories.

Interrogatory 1:

Describe all ownership interest You have or had in Corporate Defendants and all job positions and duties You performed for Corporate Defendants.

Answer to Interrogatory 1:

I did not own any part of Perfect Team Corporation, and I was a Cashier.

Interrogatory 2:

Identify all current and former owners, shareholders, officers, and directors of the Corporate Defendants, including the nature and amount of their ownership interest, their title(s) if an officer or director, and the period of times in which they held such positions or had such ownership interest.

Answer to Interrogatory 2:

The names and positions of such persons in Perfect Team Corporation are as follows:

| | | | | | |
|----------------|-------------|-----------|--------|-----------|--------|
| Chun Kit Cheng | Chairman | 6/07-1/08 | 71.5%; | 1/08-6/09 | 100.0% |
| Liai Ang | Manager | 6/07-1/08 | 10.0%; | 1/08-6/09 | 0.0% |
| Wu Rei Wu | Captain | 6/07-1/08 | 6.0%; | 1/08-6/09 | 0.0% |
| Wu Yong Qan | Captain | 6/07-1/08 | 5.0%; | 1/08-6/09 | 0.0% |
| Lang Zhong | Chef | 6/07-1/08 | 5.0%; | 1/08-6/09 | 0.0% |
| Zheng Yang Yue | Shareholder | 6/07-1/08 | 2.5%; | 1/08-6/09 | 0.0% |

Interrogatory 3

Identify all persons who have participated in the operation or management of the Corporate Defendants, including the time period of such participation, and their responsibilities.

Answer to Interrogatory 3:

The names of such persons in Perfect Team Corporation are as follows:

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|----------|------|
| Liai Ang | 2007 |
| KAVIE | 2008 |

Interrogatory 4

Identify and describe all assets You or Defendant Perfect Team Corporation or any of its owners, shareholders, directors, officers, managers, or attorneys transferred to Defendant Ji Shiang, Inc., or any of its owners, shareholders, directors, officers, managers, or attorneys (whether for value of by way of gift; whether real or personal property), including, but not limited to a description of the asset; the consideration aid, if any; and the identities of the transferor(s) and transferee(s).

Answer to Interrogatory 4:

Defendants object to this Interrogatory as overly broad, burdensome, and an improper use of interrogatories.

Interrogatory 6:

Identify all individuals who have had the power to act directly or indirectly on behalf of You and state the areas in which each has the power to act on behalf of You, including but not limited to hiring and firing workers, setting and/or changing wages, distributing wages, setting and/or changing work schedules, directing and assigning types of work, or maintaining employment records.

Answer to Interrogatory 6:

The names and positions of such persons in Perfect Team Corporation are as follows:

Liai Ang
Jia Li Wang

Interrogatory 7

Identify all current and former employees of Corporate Defendants, and indicate their dates of employment, positions, duties, hours worked, and their rate, frequency, and form of pay (e.g., cash, check, direct deposit, etc.), and their overtime rate if any.

Answer to Interrogatory 7

As to Perfect Team Corporation, such persons are:

Jia Li Wang3 of 4.

| | |
|-------------------|------------------|
| Lou Fu Rong | Chef |
| Li Si Ying | Chef |
| Zen Xie Jie | Chef |
| Lang Zhi Zhong | Chef |
| Wu Wei Pie | Chef |
| Cheng Ang Long | Chef |
| Wang Wie | Chef's Assistant |
| Zhong Wei Xiong | Chef |
| Cheng Kun Jie | Chef |
| Fen Wei Shang | Chef |
| Lei Jian | Chef |
| Liang Zhi Gan | Headwaiter |
| Cheng Chun Ping | Headwaiter |
| Zheng Xia Hong | Headwaiter |
| Wu Wei Shun | Headwaiter |
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| Zhang Shuan Shuan | Waiter |
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| Zhan Di Hui | Waiter |
| Zhong Shi Yie | Waiter |
| Tang Wei Shen? | Waiter |
| Wu Wei Jian | Waiter |
| Gao Li Rong | Waiter |
| Lin Pin Mei | Waiter Helper |
| KAVIE | Manager |
| Liai Ang | Manager |
| Wu Wei Ru | Headwaiter |
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| Zhong Shun Ping | Dim Sum Server |
| Lin Li Ran | Dim Sum Server |
| Chai Han Ying | Dim Sum Server |
| Zhong Lan Jian | Dim Sum Server |
| Ying Jie Xiao | Waiter |
| Zheng Ming | Waiter |
| Wu Shao Rong | Waiter Helper |

Interrogatory 10:

Identify any persons who have at any time participated in the tip pool at the Restaurant.

Answer to Interrogatory 10:

See tip notebook/ledger annexed hereto bearing Bates Number GAO000001-81.

Interrogatory 13:

Describe in detail all efforts made by You or anyone else on behalf of the Corporate Defendants to determine and comply with the requirements of the FLSA and NYLL concerning minimum wage, overtime pay, retention of gratuities, and spread of hours pay, including, but not limited to, efforts to obtain legal advice regarding the requirements of federal and state laws, and communications with any federal, state, or municipal department or agency concerning minimum wage and overtime laws and regulations. This request is not limited in time.

Answer to Interrogatory 13:

Defendants object to this Interrogatory as overly broad, burdensome, and an improper use of interrogatories.

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

LI RONG GAO, SHU F. JIANG, and XIAO
HONG ZHENG,

individually, and on behalf of all others
similarly situated,

WEI S. TAN and WEI J. WU, individually,

Plaintiffs,

v.

PERFECT TEAM CORPORATION d/b/a
GUANG ZHOU RESTAURANT, JI SHIANG,
INC, d/b/a GUANG ZHOU RESTAURANT,
FENG LIN, CHUN KIT CHENG a/k/a JUN JIE
ZHENG, JIA LI WANG, and ZHUO PING
CHEN a/k/a CHEUK PING CHEN,

Defendants.

Civil Action No.
10-CV-1637 (ENV) (CLP)

STATE OF NEW YORK

COUNTY OF QUEENS

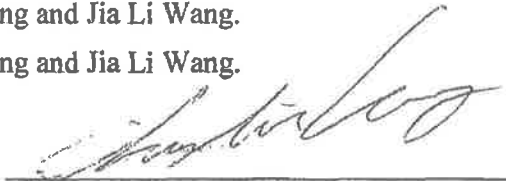
)
) SS:
)

The undersigned, being duly sworn, deposes and says:

1. This affidavit is submitted pursuant to this Court's order dated May 13, 2011.
2. The statements herein are to the best of my knowledge.
3. Perfect Team and I have already provided all responsive documents.
4. No assets of Perfect Team Corporation or mine were transferred to Ji Shiang, Inc. or any of its owners, shareholders, officers, etc.
5. I do not know of anyone else that participated in the tip pool other than what has already been disclosed.
6. Perfect Team's efforts to comply with federal and state labor law include, but is not limited to: posting minimum wage posters; paying for workers' compensation, disability and unemployment insurance; posting job safety notices; and not discriminating against employees.
7. I have nothing to do with, nor do I have any knowledge relating to, Ji Shiang, Inc.
8. Relating to Perfect Team Corporation:

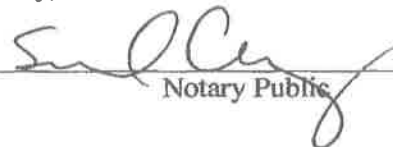
| | | | | | |
|----------------|-------------|-----------|--------|-----------|--------|
| Chun Kit Cheng | Chairman | 6/07-1/08 | 71.5%; | 1/08-6/09 | 100.0% |
| Liai Ang | Manager | 6/07-1/08 | 10.0%; | 1/08-6/09 | 0.0% |
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| Lang Zhong | Chef | 6/07-1/08 | 5.0%; | 1/08-6/09 | 0.0% |
| Zheng Yang Yue | Shareholder | 6/07-1/08 | 2.5%; | 1/08-6/09 | 0.0% |

9. The persons participating in the operation or management of Perfect Team Corporation are: Liai Ang, 2007, and KAVIE, 2008.
10. The individuals who had the power to act directly or indirectly on behalf of Perfect Team Corporation, include, but is not limited to: Liai Ang (e.g., hiring and firing workers, and directing and assigning types of work) and Jia Li Wang (e.g., distributing wages and maintaining employment records).
11. I do not understand which facts or the application of facts to law relating to my affirmative defenses.
12. Relating to interrogatory #5, Allen Wu, Esq., 747 3rd Ave. New York, NY 10017.
13. Relating to interrogatory #8, Liai Ang, Jia Li Wang, and the head waiters.
14. Relating to interrogatory #9, Liai Ang, Jia Li Wang, and the head waiters.
15. Relating to interrogatory #11, Liai Ang and Jia Li Wang.
16. Relating to interrogatory #12, Liai Ang and Jia Li Wang.



CHUN KIT CHENG
Defendant Individually, and as Representative
of Defendant PERFECT TEAM
CORPORATION

Sworn to before me this 27 day
of May, 2011



Notary Public

Samuel J. Chuang
Notary Public, State of New York
No. 02CH6059545
Qualified in New York County
Commission Expires May 29, 2011

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

LI RONG GAO, SHU F. JIANG, and XIAO
HONG ZHENG,

individually, and on behalf of all others
similarly situated,

WEI S. TAN and WEI J. WU, individually,

Plaintiffs,

v.

PERFECT TEAM CORPORATION d/b/a
GUANG ZHOU RESTAURANT, JI SHIANG,
INC, d/b/a GUANG ZHOU RESTAURANT,
FENG LIN, CHUN KIT CHENG a/k/a JUN JIE
ZHENG, JIA LI WANG, and ZHUO PING
CHEN a/k/a CHEUK PING CHEN,

Defendants.

Civil Action No.
10-CV-1637 (ENV) (CLP)

STATE OF NEW YORK

COUNTY OF QUEENS

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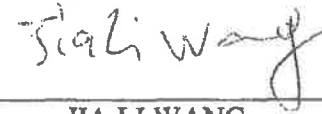
SS:

The undersigned, being duly sworn, deposes and says:

1. This affidavit is submitted pursuant to this Court's order dated May 13, 2011.
2. The statements herein are to the best of my knowledge.
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4. No assets of mine were transferred to Ji Shiang, Inc. or any of its owners, shareholders, officers, etc.
5. I do not know of anyone else that participated in the tip pool other than what has already been disclosed.
6. My efforts to comply with federal and state labor law include, but is not limited to: posting minimum wage posters; paying for workers' compensation, disability and unemployment insurance; posting job safety notices; and not discriminating against employees.
7. I have nothing to do with, nor do I have any knowledge relating to, Ji Shiang, Inc.
8. Relating to Perfect Team Corporation:

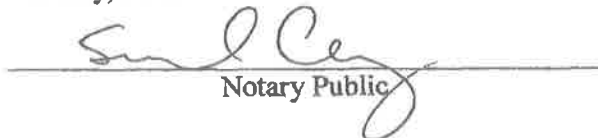
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| Liai Ang | Manager | 6/07-1/08 | 10.0%; | 1/08-6/09 | 0.0% |
| Wu Rei Wu | Captain | 6/07-1/08 | 6.0%; | 1/08-6/09 | 0.0% |
| Wu Yong Qan | Captain | 6/07-1/08 | 5.0%; | 1/08-6/09 | 0.0% |
| Lang Zhong | Chef | 6/07-1/08 | 5.0%; | 1/08-6/09 | 0.0% |
| Zheng Yang Yue | Shareholder | 6/07-1/08 | 2.5%; | 1/08-6/09 | 0.0% |

9. The persons participating in the operation or management of Perfect Team Corporation are: Liai Ang, 2007, and KAVIE, 2008.
10. The individuals who had the power to act directly or indirectly on behalf of Perfect Team Corporation, include, but is not limited to: Liai Ang (e.g., hiring and firing workers, and directing and assigning types of work) and Jia Li Wang (e.g., distributing wages and maintaining employment records).
11. I do not understand which facts or the application of facts to law relating to my affirmative defenses.
12. Relating to interrogatory #5, Allen Wu, Esq., 747 3rd Ave. New York, NY 10017.
13. Relating to interrogatory #8, Liai Ang, Jia Li Wang, and the head waiters.
14. Relating to interrogatory #9, Liai Ang, Jia Li Wang, and the head waiters.
15. Relating to interrogatory #11, Liai Ang and Jia Li Wang.
16. Relating to interrogatory #12, Liai Ang and Jia Li Wang.



JIA LI WANG

Sworn to before me this 27 day
of May, 2011


Notary Public

Samuel J. Chuang
Notary Public, State of New York
No. 02CH6059545
Qualified in New York County
Commission Expires May 29, 2011